



Phone (208)983-2751 FAX (208)983-1428

320 West Main Street, Grangeville, ID 83530

BOARD OF IDAHO COUNTY COMMISSIONERS

April 17, 2018

Cheryl Probert, Forest Supervisor
Nez Perce-Clearwater National Forest
903 3rd Street
Kamiah, ID 83536

RE: Hungry Ridge Restoration Comments

Dear Cheryl;

Idaho County has reviewed the Draft Environmental Impact Statement (DEIS) for the Hungry Ridge Restoration Project.

We support active management in the 30,000 acre proposed area. Although cited in the literature list, it does not appear that the Idaho County Natural Resource Plan was used to help formulate alternatives.

Several areas of interest to Idaho County are:

Economics

Alternative 3 is preferred by Idaho County based on the Present Net Value as shown in Table 3-14. Alternative 3 would maximize potential 25% return to Idaho County.

Currently, SRS has only been reauthorized through 2019 with an unknown future and continued declines in the amount received. It will be crucial that advertised sales be standard 2400-6 sales to provide potential County tax relief.

If stewardship or Good Neighbor sales are proposed, an alternative must be developed that displays the cause and effect of such action to Idaho County and the taxpayers. It appears that the proposed sale date in 2018 as shown on Page 3-41 is incorrect.

Access

It is unclear if road decommissioning proposed is 24.8 miles or 38.3 miles (Alt. 3) shown on Page xi. The Idaho County Natural Resource Plan considers maintaining adequate access an important factor. Long term storage rather than decommissioning should be utilized on more than the 3.9 miles shown in Action Alternatives.

In discussions with folks knowledgeable of the area, more miles (up to 10 miles more) would be best put into long term storage, keeping them available for fire access and treatment. We are willing to work with you to identify those roads.

The Forest Service needs to identify and clearly display those roads and trails that have been identified by the County as RS2477 eligible. We can supply RS2477 mapping if needed and believe it is important to check status.

Recreation

The Idaho County Natural Resource Plan, on page 23, Desired Condition 8, states: "The Grand Exploration Motorized (GEM) trail traverses Idaho County from Valley County to Clearwater County."

Idaho County sees the Hungry Ridge to Otter-Wing connection as the key link in this trail and we don't understand why the off-road motorized trail from Elk City to the Salmon River was considered outside the scope of this project. Recreation continues to be poorly analyzed and opportunities to improve recreation are mostly foregone.

Hungry Ridge is a unique place on the forest with private in-holding with significant infrastructure in place, abundant wildlife, close to wilderness and roadless area, while relatively close to population centers. Due to these factors, recreation use will only increase and opportunities to meet demand while mitigating impacts seems to not be a priority.

Protection is not shown for two trailheads at Buck Meadows and Corral Creek. Also shown is reconditioning of the road over the top of the 431 Driveway Trail. What are the plans for protection of the trail?

We would like to engage in dialogue on how we can move recreation on more equal footing with other resource areas.

Noxious Weeds

The Nez Perce Clearwater Forest has traditionally been a strong supporter and partner of strategic weed management within all of Idaho County. Ground disturbing activities always pose a threat to weed spread. Idaho County recommends this project place great emphasis on well-defined and trackable preventative measures. Preventative measures would not only include pre and post treatment of haul roads, cleaning of equipment prior to entering or moving within the project, but also an adequate assessment of risk of weed spread using current and industry accepted models. These models would then drive one of the most important steps to prevention when considering impacts to a landscape from a project like this; Early Detection Rapid Response (EDRR). Identifying priority sites to survey and inventory for weed spread is crucial in the effort to prevent a new ecological disaster from weed invasion.

The proposed project area is highly susceptible to numerous problematic and costly invasive plants not yet known or established in the area. It is recommended that USFS work with

entities such as University of Idaho Extension Professor Timothy Prather to adequately assess areas of risk of spread and mitigate activities accordingly and/or implement strong control measures post treatment. Idaho County would like additional information on data and process used to create current weed risk of spread within the project area.

Current weed infestations within the project area include widespread infestation of species such as and spotted knapweed. This species now occupies and dominates vast expanses of ground within the project area, reducing resource values for wildlife, recreation, livestock grazing and species diversity to mention a few. Without commitment from the top down to an adequate prevention to weed spread and expansion, this project proposal poses significant harm to the landscape.

The project area also contains small populations of high risk weeds posed to do great damage to the landscape without adequate treatment efforts. These sites require a minimum of three chemical or manual treatments per growing season for multiple years in order to eliminate any reproductive parts posing a risk to spread the sites. This takes concerted dedication from the top down to accomplish this.

In areas of high disturbance by equipment or fire or otherwise, restoration and reseeding where appropriate with certified weed-free materials would help increase the health of forested and non-forested grounds within this project area. The Draft EIS states a low effectiveness with reseeding efforts. This is likely due to the timing of implementation that is typically closely tied to financial sideboards. Well planned reseeding projects not subject to emergency fire funding or other time sensitive funding would produce greater weed spread and expansion effectiveness.

Current Condition

Invasive plants are not covered under current conditions. Invasive plants directly affect all managed resources and should be seriously considered at all stages of EIS.

Mitigation Majors

Table 2-3 Mitigation Measures

- Include a measure to revegetate disturbed areas as appropriate (where revegetation or reseeding success rate would be moderate to high)
- Identify weed free zones and protect from spread or expansion
- Prevent spread within project
- Aggressive committed treatment of existing high priority sites prior to harvest
- Monitor treatment effectiveness and adapt if effectiveness isn't adequate for eradication objective
- (on side note is rare plant mitigation accurate. Doesn't make sense.)

Analysis Methods

Analysis methods and Indicators (3-47)

Indicators and methods are not listed or are not clear for Invasive plants

Weed Expansion Risk

Table 3-15

Expansion Probability Rating column needs editing. Row breaks look incorrect.

Existing Condition

It is stated that less than 3% of project area is occupied by noxious weeds. (Assuming noxious means state listed noxious.) All inventoried weeds within the CWMA is closer to 7%. However, it is known by the CWMA that inventories of large infestations of weeds ceased once it was clear that the extent of these infestations were too large to continue mapping. Thus, CWMA partners agreed species like Canada thistle and spotted knapweed occupy literally every suitable habitat across this portion of the CWMA, at variable densities, therefore shifting management priority to a maintenance category. In other words, the current description of existing conditions doesn't adequately reflect actual inventory, and the stated percent of inventory given in this EIS is significantly understated. Which also affects the analysis section. Another estimate of current inventory should be generated for this EIS. For example, using GIS the specialist could calculate acres for noxious species by all roads and trails within suitable habitat, and all suitable habitat. It is expected that infested acreage would be significantly greater than currently estimated.

Based on the experience of our Noxious Weeds Supervisor, it is believed that tall hawkweed, a new invader to the area with similar expansion potential as other hawkweeds, is present along roads and trails within the project area. The current inventory doesn't reflect these infestations, but efforts should be made survey, properly identify and inventory these infestations in order to include them on the CWMA annual operating plan. These infestations are at a level where eradication is absolutely possible with adequate effort.

Direct/Indirect

- Clear definition of spread and expansion not made.
- Emphasize to decision maker that "steady application of design criteria & extensive monitoring for 3-5 years past project implementation to ensure weed expansion would not occur". Would like to see this repeated throughout each section because it is critical.

Weed Spread Risk

No summary or description. Table 3-4 uses expansion and spread interchangeably.

Weed Expansion Risk

- Previously expansion was defined as previous 10 year ground disturbance. Now it references current alternative disturbances. A table is reference but given.
- CWMA should be Upper Clearwater CWMA. Clearwater CWMA is a different CWMA.

Transportation

There is more than just road reconditioning proposed. The EIS should analyze all ground disturbing road work.

Watershed/Fisheries

Culvert replacements can be source of new weed seed introduction and expansion of current infestations. Culvert disturbance should be analyzed more thoroughly with a mitigation piece tied to prevention of spread.

Alternatives 2/3

- Discusses establishment but not expansion or spread over time.
- How did specialist arrive at % of establishment, and why is the analysis introducing new effect of “establishment” rather than discussing expansion and spread directly?

Effectiveness of Mitigation

This section should better summarize mitigation effectiveness and rationale/reasons for levels of effectiveness. For now, this section is just a place holder it seems.

Summary

Clearer description of expansion risk and spread risk is needed. Expansion, spread risk and general weed risk not well defined and possibly used interchangeably when they have different meanings. Again definitions/explanations for each needed. It's also recommended for better understanding by the public that the EIS reference the methods/models used for the analysis.

Maps displaying risk to spread and expansion should be included for public review in the document.

Neither the Range nor Invasive section mention how weeds affect forage value.

Big Picture Comments

The Forest Plan goal 1 indicate providing for sustained yield of resource outputs that will help support economic structure of local communities. Idaho County would like to see the Forest apply more Regular Timber Sales across their projects. Current economic conditions for affected local communities are such that mills are closing. Despite current socio-economic

studies, local community governments don't feel that communities they govern have high resiliency when enduring volatile timber revenue.

Idaho County encourages NPCNF to emphasize Forest-wide management plans that include dedicated, consistent maintenance of harvested sites in an effort to prevent future stand replacing wild fire events due to over grown, even aged conditions as a result of lack of long term management emphasis.

Idaho County Resource Plan-Invasive Plants

Idaho County requests that the EIS consider how the invasive plants analysis addresses the Idaho County Resource Plan- Invasive Plants (Noxious Weeds) section of Desired Conditions 1 and 2 (with spread meaning new introductions and expansion of existing) and 3.

In summary, Idaho County recommends that a significant component of this project outlines weed management strategies that include prevention, treatment and restoration in cooperation with existing partnerships where applicable.

Fuels and Fire Management

Idaho County supports the burn treatment "area" concept on the outer portions of the project area. This concept eliminates lining individual harvest units, but still provides fuels treatments that will enable land managers to make good, site specific decisions should wildland fire threaten the treated areas. Suppression and management actions based on landscape treatments are more economical and strategic.

Additionally, the focused harvest and fuel management treatments in units adjacent to private in-holdings in the project area appear to comprehensively address both WUI and vegetation management concerns that will lessen the threat of wildland fire to private property.

We look forward to forward to working with you in coordinating this project moving forward.

Sincerely,



R. Skipper Brandt, Chairman



Mark Frei



Denis B. Duman